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* Oregon License OSB 040922

* Washington License WSB 42476

February 10, 2025

Universal Protection Service, LP a limited partnership of California
dba Allied Universal Security Protection
161 Washington Street Ste 600
Conshohocken, PA 19428

Universal Protection Service, LP a limited partnership of California
dba Allied Universal Security Protection
c/o Corporation Service Company
1127 Broadway Ste NE Ste 310
Salem, OR 97301

Universal Protection Service, LP a limited partnership of California
dba Allied Universal Security Protection
450 Exchange
Irvine, CA 92602

NOTICE OF NONPAYMENT OF WAGES AND
NOTICE OF WAGE CLAIM (ORS 652.150 & 652.200; 29 USC 216)
REQUEST FOR PERSONNEL FILE (ORS 652.750)

Re: Unpaid Wages, Liquidated Damages, and Penalty Wages

BE AWARE AND TAKE NOTICE:

Connor Haddock gives notice of nonpayment of wages and demands full payment of all unpaid wages, compensation, liquidated damages, penalty wages and statutory interest due by reason of employment with Universal Protection Service, LP a limited partnership of California doing business as Allied Universal Security Protection (herein "Allied Universal"). Allied Universal employed Mr. Haddock as a security guard from approximately October 15, 2024 until he quit his employment effective December 28, 2024. Allied Universal agreed to pay Mr. Haddock at \$35 per hour to be paid on each Thursday as the regular payday.

During employment, Allied Universal failed to pay Mr. Haddock at least minimum wages on October 24, November 7 and November 14, 2024 for a total of \$3,176.65 in wages that were not timely paid. Under the Fair Labor Standards Act ("FLSA"), Allied Universal was required to pay Mr. Haddock's wages on payday. *Biggs v. Wilson*, 1 F.3d 1537 (9th Cir. 1993). Because

Notice of Wage Claim – Connor Haddock
February 10, 2025
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Allied Universal failed to pay wages on payday, Mr. Haddock is entitled to liquidated damages. 29 USC 206; 29 USC 216(b).

Mr. Haddock ended his employment without giving at least two full business days' notice. Allied Universal was required to pay all of Mr. Haddock's wages within five business days or the next payday, whichever comes first. ORS 652.140(2). Allied Universal failed to pay all of Mr. Haddock's wages on Thursday January 2, 2025. Allied Universal finally paid Mr. Haddock's wages on Thursday January 23, 2025 – 21 days late.

Because wages remain due and/or were not timely paid, Mr. Haddock is entitled to penalty wages. ORS 652.150. Penalty wages are calculated at 8 hours per day times \$35 per hour, for each calendar day that wages remain unpaid up to a maximum of 30 calendar days. The 21 days of penalty wages totals \$5,880.00.

Mr. Haddock is entitled to simple statutory 9% interest on all unpaid and penalty wages. ORS 82.010 and *Russell v. US Bank Nat'l Ass'n*, 246 Or App 74 (2011). Mr. Haddock is also entitled to recover costs and attorney fees. ORS 652.200; 29 USC 216(b).

Mr. Haddock also requests that Allied Universal provide the personnel file, including all records showing hours worked and payroll records. ORS 652.750. Please deliver these records to me at Schuck Law, LLC's office. We will provide a secure dropbox link upon request. If it is discovered after receiving these records that Mr. Haddock is due additional wages, those wages are also requested. Mr. Haddock provides notice of his intention to file a claim for unpaid wages, penalty wages, liquidated damages, statutory interest, and costs and attorney fees against Allied Universal

All cure efforts shall be made through this office. Mr. Haddock specifically requests all payments be by check. ***Please note that any prior authorization for payment by any other means besides check, including but not limited to direct deposit or payroll card, are revoked and now invalid.***

If you have questions, you should contact an attorney. If you need help in finding an attorney, you should call the Oregon State Bar's Lawyer Referral Service at (503) 684-3763, or toll-free at (800) 452-7636.

Sincerely,


Karen A. Moore

KAM:eac

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